

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY SCHEDULE FOR
POST-DISTRIBUTION ACCOUNTING
FOR THE CLASS ACTION
SETTLEMENTS**

This Document Relates to:

All Class Actions

Plaintiffs and Defendants stipulate and agree, subject to the Court's approval, to modify the schedule in connection with the class settlements' post-distribution accounting.

WHEREAS, on March 6, 2024, the Court directed that the class settlements' post-distribution accounting should be filed by September 25, 2024, and scheduled a hearing for October 2, 2024. Dkt. 4204. In the minute order, the Court noted that "Counsel may stipulate to move these deadlines so that the accounting will be filed at least 21 days after the settlement payments have issued and/or become stale, whichever date is later." *Id.*

WHEREAS, Class Counsel and the Settlement Administrator for the class settlements, Epiq, submitted their plan for the handling of likely fraudulent claims, which the Court approved on May 6, 2024. Dkt. 4236. In that minute order, the Court again noted that "[t]he case management

1 conference for the class settlements' post-distribution accounting remains set for October 2, 2024,
2 but may be moved on stipulation of the parties." *Id.*

3 WHEREAS, Class Counsel and Epiq have implemented the approved fraud plan, and
4 anticipate sending out a first distribution of payments to claimants no later than October 4, 2024;

5 WHEREAS, checks issued by October 4, 2024 will become stale on April 4, 2025;

6 WHEREAS, the parties stipulate that the deadline to file a post-distribution accounting
7 should be moved to April 30, 2025, and a hearing set at the Court's convenience;

8 WHEREAS, if a second distribution is needed, counsel will notify the Court and may
9 request further changes to the schedule for the post-distribution accounting;

10 NOW THEREFORE, the Plaintiffs and the Defendants, through their undersigned counsel,
11 hereby stipulate, agree and respectfully request that the Court order as follows:

12 The class settlements' post-distribution accounting shall be filed by **April 30, 2025**, and a
13 hearing scheduled at the Court's convenience if the Court deems it appropriate. These dates may
14 be further adjusted on stipulation of the parties and subject to approval of the Court.

15
16 **IT IS SO STIPULATED.**

17
18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19
20 Dated: _____

21 _____
Honorable Judge William H. Orrick

Dated: September 25, 2024

Respectfully submitted,

By: /s/ Timothy S. Danninger

By: /s/ Sarah R. London

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ATTESTATION

I, Dena C. Sharp, am the ECF User whose ID and password are being used to file this document. In compliance with Civil. L.R. 5-1(i)(3), I hereby attest that counsel has concurred in this filing.

Dated: September 25, 2024

/s/ Dena C. Sharp

CERTIFICATE OF SERVICE

I, Dena C. Sharp, hereby certify that on the September 25, 2024, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notifications to all counsel of record.

/s/ Dena C. Sharp